



## **Water Hygiene Management Policy**

Date Effective: May 2021  
Date of Review:



**1. Purpose**

The overall aim of this policy, and the associated procedures and control documents is to ensure the safety from infection from legionella for people living and working in properties, owned, managed or leased by Riverside Scotland (the trading name for Irvine Housing Association) as a subsidiary company of The Riverside Group [TRG].

Riverside Scotland aims to protect the occupiers of its properties, as well as other residents, visitors, staff, contractors and the general public, from the risks associated with legionella so far as is reasonably practicable.

This document sets out key policy objectives, control measures and accountabilities for ensuring legionella safety.

This purpose of this policy is to ensure Riverside Scotland meets its obligations under the following legislation:

- The Health and Safety at Work etc. Act 1974;
- The Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health (COSHH) Regulations (as amended) 2002
- The Housing Scotland Act
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- The Water Supply (Water Fittings) Regulations 1999 S I 1999
- The Water Supply (Water Fittings) (Amendments) Regulations 1999.
- The Scottish Housing Quality Standard (SHQS) and the Scottish Government's Repairing Standard.

The application of this Policy ensures that Riverside Scotland meets compliance with the outcomes of the Scottish Housing Regulator as outlined below:

Registered Social Landlords must meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes and comply with the 'Healthy, Safe and Secure' elements of the Scottish Housing Quality Standard.

Riverside Scotland acknowledges and accepts its responsibilities under the applicable regulations and legislation and that failure to properly discharge these responsibilities may result in:

- Prosecution by Health and Safety executive under Health and Safety at Work Act 1974.
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- Enforcement action by the housing regulator

**2. Scope**

This policy applies to all properties owned, managed or leased by Riverside Scotland.

	<p>The default position for any buildings owned or managed by Riverside Scotland is that Riverside Scotland will actively manage that risk unless the lease document or other evidence is held to confirm Riverside Scotland are legally 'exempt' from management responsibility.</p>
<p><b>3.</b></p>	<p><b>Key Legal Requirements</b></p> <p>UK regulations place an explicit duty on preventing or controlling the risk from exposure to water borne bacteria. Riverside Scotland have implemented this policy in order to ensure compliance with the COSHH, regulations 7 and 9; HSW Act, sections 2, 3 and 4, ACOP L8 which places a duty on Riverside Scotland to manage water supply and installed systems within its portfolio.</p> <ol style="list-style-type: none"> <li>1. Prepare a management plan</li> <li>2. Appoint competent person to manage risk (Nominated Responsible Person).</li> <li>3. Take reasonable steps to identify and assess sources of risk (Risk Assessment)</li> <li>4. Prepare a scheme to prevent or control risk of exposure to legionella bacteria, (Written Control Scheme)</li> <li>5. Implement appropriate management arrangements (Monitoring) <ul style="list-style-type: none"> <li>▪ Reduce potential risks from water systems</li> <li>▪ implementing, managing and monitoring precautions and routine inspections</li> </ul> </li> <li>6. Keep a written record of assessments, monitoring and precautions. (Record)</li> </ol>
<p><b>4.</b></p>	<p><b>Key policy objectives</b></p> <p>Riverside Scotland will:</p> <ol style="list-style-type: none"> <li>1. Implement a "Water Hygiene Management Plan" for the portfolio</li> <li>2. Appoint a Responsible Person who will have a duty to put in place a Water hygiene Management Plan [WHMP] to minimise the risk of water borne bacteria (including legionella) and to manage and monitor the necessary work systems and procedures.</li> <li>3. Carry out a risk assessment across the portfolio [PRA] to identify, where practicable, buildings with water supply systems where conditions may be present that encourage water borne bacteria (including legionella) to multiply and/or disperse.</li> <li>4. Use the PRA to identify risk in certain types of buildings and carry out surveys and/or Legionella Risk Assessments [LRAs] in those buildings to identify hazards relating to risk of infection and develop procedures to evaluate the risk and determine the appropriate remedial actions and control measures.</li> <li>5. Establish and keep up-to-date, a record of the water systems and installations, risk assessments, maintenance, inspection and testing (The "Register")</li> <li>6. Use the outcomes from the LRAs to arrange programmes of routine inspection and testing of water systems, including, where needed, a programme of modification to any deficient systems and equipment.</li> <li>7. Ensure that for dwellings left vacant for extended periods of time a suitable drain-down or flushing regime is put in place to prevent the potential build-up of risk conditions</li> <li>8. Keep all relevant personnel adequately trained in practices and procedures with respect to the control of Legionella.</li> </ol>

	<p>9. Introduce an approach to ensuring risk information is provided to those affected including customers, stakeholders.</p> <p>10. Ensure that contracts with external contractors are managed effectively and robust contract monitoring is in place to monitor performance and promote continuous improvement.</p>
<p><b>5.</b></p>	<p><b>Policy implementation</b></p> <p>The accountabilities for implementation of this policy are as set out below:</p> <ol style="list-style-type: none"> <li>1. Riverside Scotland's Managing Director retains overall accountability for the implementation of this policy and is the Responsible Person.</li> <li>2. Riverside Scotland's Head of Service Delivery in direct liaison with TRG's Executive Director of Asset Services is responsible for policy implementation and ensuring that adequate resources are made available to enable the objectives of the policy to be met.</li> <li>3. Riverside Scotland's Head of Service Delivery in direct liaison with TRG's Director of Building Safety is responsible for delivery of the key policy objectives as set out herein including designing and implementing procedures, staff training, and communication to customers.</li> <li>4. Riverside Scotland's Head of Service Delivery in direct liaison with TRG's Head of Compliance is accountable for the development, implementation and monitoring of effective Compliance Management policies, procedures</li> <li>5. Riverside Scotland's Asset Services Manager in direct liaison with TRG's Compliance Manager is responsible the delivery and monitor of compliance activity and the operational effectiveness of the Compliance Management model and policies, procedures and development and communication of staff and customer guidance.</li> <li>6. Neighbourhood Services and front line staff shall support Asset Management and contactors teams in gaining access to carry out legionella related works and maintenance.</li> <li>7. Riverside Scotland's Head of Service Delivery in direct liaison with TRG's Head of Health, Safety and Environment is responsible for ensuring the policy is kept up to date with prevailing legislation and statutory obligations.</li> <li>8. a set of process maps, procedures and control documents. All staff are responsible for following the requirements of those documents.</li> </ol>

## 6. Portfolio Risk Assessment [PRA] and Legionella Risk Assessments [LRA]

Category	Property Structure	Risk rating	Asset information	Source	Count	High - Enhanced regime	Medium-Routine regime	Low-Assessment visit only	Tolerable-No visit	Notes
					Interval →	H-2 years	M - 3 years	L-5 years	T	
1	Block	1	Communal heating	PM3	No. Blocks with Communal heating		All			
2	Block	2	No communal heating (C&S)	Academy	No. Blocks excluding Category 1	All enhanced care				
3	Block	2	No communal heating (C&S)	Academy	No. Blocks excluding Category 1		All independent living			Included in 2 pending more data analysis
4	Block	3	No communal heating (Commercial)	Academy	No. Blocks excluding Category 1		All			
5	Block	3	No communal heating (GNR)	Academy	No. Blocks excluding Category 1			Assessment visit within 5 years		Moves to another category after initial assessment
6	Flat	4	Common supply	PM3	No. of Flats attached to Communal Heating		Included in Cat 1			
7	House	5	Potentially stored water	PM3	No combi installed			Subject to further analysis of asset data		Potential for "No visit" depending on types of systems/risk appetite
8	Flat	5	Potentially stored water	PM3	No combi installed					
9	House	6	No stored water	PM3	Combi installed			No	Yes	
10	Flat	6	No stored water	PM3	Combi installed					

1. Riverside Scotland in partnership with TRG have developed a practical and proportionate portfolio risk assessment approach to distinguish properties that require a risk assessment to be undertaken. If the risk is deemed to be very low and tolerable, risk can be mitigated with control measures, without a site specific risk assessment being documented.
2. Riverside Scotland will always have a Legionella Risk Assessment (LRA) carried out if there are communal water facilities, e.g. within a workplace or building with common/shared parts. The exception being if the communal water asset is only a single external mains fed cold water bib tap (garden tap).
3. The assigned portfolio categories help to distinguish properties of greatest risk which require a detailed site specific legionella risk assessment to be undertaken and documented. It also helps to distinguish properties in the general needs housing stock which do not require elaborate control measures and where the risk can be mitigated through a managed approach. Full details are contained with the WHMP.

### Water Hygiene Management Plan

Riverside Scotland will consult upon and issue the Water hygiene Management Plan [WHMP] and will carry out training with staff and contractors to ensure its requirements are understood.

The management plan sets out the mechanism by which water systems and installations are managed.

## 7. The Compliance Register

Riverside Scotland will;

1. Set up and manage a water hygiene compliance register [the Register] and ensure it is kept up to date with details of water systems and installations requiring a risk assessment.
2. Record the findings of any survey/risk assessment or any implementation risk reduction activity including control measures will be documented within the Compliance Register.
3. When any work is undertaken to mitigate the risks or remove the risk by altering the installation etc a clear record will be made within our compliance register.

	<ol style="list-style-type: none"> <li>4. The Register will be updated when we implement any risk reduction activity including control measures or remove the risk by altering the system.</li> <li>5. Record any routine inspection and testing of water systems,</li> <li>6. Where possible contractors will be given access to live survey data in order to update their own systems, in real time, without the need to access the Register via an online based portal.</li> </ol>
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<b>8.</b>	<p><b>Monitoring and Quality Control</b></p> <p>Riverside Scotland will monitor implementation of this policy using a set of performance measures as below (subject to catch up as above):</p> <p>Policy implementation will be reviewed:</p> <ol style="list-style-type: none"> <li>1. Quarterly by Riverside Scotland's Compliance and Health and Safety Manager in direct liaison with TRG's Performance and Compliance Team, and reported to Riverside Scotland's Board or delegated sub-committee and TRG's Asset Services SMT.</li> <li>2. Annually by a suitable qualified and accredited 3<sup>rd</sup> party and a report provided to Riverside Scotland's Board or delegated sub-committee and TRG's Executive Director of Asset Services.</li> <li>3. By the internal audit team, as required, and a report provided to Riverside Scotland's Board or delegated sub-committee and TRG's Group Audit Committee.</li> </ol>
<b>9.</b>	<p><b>Guidance</b></p> <p>This policy reflects best practice by adopting the principles and processes of robust legionella control set out in the following publications:</p> <ol style="list-style-type: none"> <li>1. Approved Code of Practice (ACOP) L8 – 'Legionnaires Disease: The Control of Legionella Bacteria in Water Systems' Approved Code of Practice.</li> <li>2. HSG274 Parts 2 and 3</li> <li>3. BS8580:2010 – Water Quality – Risk Assessments for Legionella Control – Code of Practice.</li> <li>4. BS8558:2011 Specification for Design Installation, Testing and Maintenance of Services Supplying Water for Domestic Use within Buildings and their Curtilages.</li> <li>5. BS7942: 2000 Thermostatic Mixing Valves for use in Care Establishments.</li> <li>6. HELA Circular, Scalding risks for Hot Water in Health and Social Care, LAC Number 79/5</li> </ol>